

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:)
) Bankruptcy Case
MOHAMED A. EL RAFAEI,) No. 20-12583-KHK
) Chapter 7
Debtor.)

**APPLICATION FOR ALLOWANCE AND PAYMENT OF FEES AND COSTS OF
THOMAS, THOMAS & HAER, LLP AS TRUSTEE'S COUNSEL**

Comes now, Charles B. Peoples of Thomas, Thomas & Haer, LLP as counsel for H. Jason Gold, the Chapter 7 Trustee ("Trustee") in the above captioned matter and files this Application for Allowance and Payment of Fees and Costs of Thomas, Thomas & Haer, LLP as Trustee's Counsel, and states to the Court as follows:

1. On November 23, 2020, Mohamed A. El Rafaei ("Debtor") filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.
2. On August 2, 2022, this Court entered an Order Approving Appointment of H. Jason Gold as Chapter 11 Trustee.
3. On August 17, 2022, this Court entered an Order Granting a Motion to Convert Case to Chapter 7. H. Jason Gold was appointed Chapter 7 Trustee.
4. The Trustee hired Charles B. Peoples and Thomas, Thomas & Haer, LLP ("TTH") as counsel to represent him with respect to any claims and/or causes of action that the Estate may possess pursuant to a retainer agreement attached hereto as Exhibit A that provided that TTH would be compensated in the amount of 38% of the gross recovery.

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5. Collection efforts were undergone, and the following Adversary Proceedings were filed:

- a. 22-01088 Gold v. Moustafa
- b. 22-01089 Gold v. Rhanime
- c. 22-01090 Gold v. Shehata
- d. 22-01094 Gold v. Kebaish
- e. 23-01042 Gold v. Retro Hub, LLC
- f. 23-01043 Gold v. Rhanime

6. The gross recovery from these cases was \$25,530.17, justifying a 38% contingency fee of \$9,701.46.

7. TTH performed 458.8 hours of billable work on these files, and incurred \$10,224.22, which remains outstanding. The hours and expenses are itemized on the bill attached hereto as Exhibit B.

8. The hours expended result in a effective billable hourly rate far below the market rate for services in this geographic area.

9. The services rendered and expenses incurred were reasonable and necessary to the administration of this case, were provided in an efficient and effective manner, and are appropriate for payment by the estate.

WHEREFORE, for the reasons stated herein, the undersigned counsel to the Trustee respectfully requests approval of a total fees and expenses award of \$19, 925.68, consisting of \$9,701.46 in fees and \$10,224.22 in expenses as sought in this Application and any other such further relief that this Court deems appropriate.

Respectfully submitted,

/s/ Charles B. Peoples

Charles B. Peoples, Esquire

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Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of July 2025, the foregoing Application was served via CM/ECF to the parties registered to receive such notices, including:

Office of the United States Trustee
1725 Duke Street, Suite 650
Alexandria, VA 22314

/s/ Charles B. Peoples

Charles B. Peoples, Esquire
Virginia Bar No. 89981